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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

Ace Foam, Inc., Adams Foam Rubber Co.,)
Cambridge of California, GCW Carpet)
Wholesalers, Foam Factory, J&S Packaging,)
Inc. and VFP Acquisitions d/b/a Vanguard)
Foam and Packaging Company;)
on behalf of themselves and all others)
similarly situated,) MDL Docket No. 2196

Plaintiffs,) Index No. 10-MD-2196 (JZ)

v.)

Carpenter Holdings, Inc.,)
INOAC International,)
INOAC Corp.,)
David Carson,)
Louis Carson, and)
Woodbridge Sales & Engineering,)

Defendants.)

In re: Polyurethane Foam Antitrust Litigation)

This document relates to:)

All Direct Purchaser Cases)

ANSWER OF LOUIS CARSON

Defendant Louis Carson ("Louis"), denies any and all wrongdoing in regard to any of the allegations contained in the Complaint filed against him, and further answering says as follows:

1. With regard to each and every paragraph of the Complaint which does not in any way mention Louis, David Carson ("David") or Scottdel, Inc. ("Scottdel"), Louis either lacks knowledge or information sufficient to form a belief about the truth of those allegations, or denies the same.

2. He denies that he, or to his knowledge, Scottdel or David did anything unlawful, illegal or committed any violation of law of any kind as alleged in the Complaint.

3. Answering paragraph 18 of the Complaint, he specifically denies all of the sentences of paragraph 18 of the Complaint.

4. Answering paragraph 19 of the Complaint, he admits the first sentence of paragraph 19, but specifically denies all of the remaining sentences of paragraph 19 of the Complaint.

5. Answering paragraph 20 of the Complaint, he admits the allegations contained in paragraph 20 of the Complaint.

6. Answering paragraph 58 of the Complaint, he denies the averments set forth in paragraph 58 of the Complaint.

7. Answering paragraph 60 of the Complaint, he lacks knowledge and information sufficient to form a belief about the truth of all of the sentences in paragraph 60 of the Complaint.

8. Answering paragraph 88(i) he lacks knowledge and information sufficient to form a belief about the truth of the first sentence of paragraph 88(i), he admits the second sentence of paragraph 88(i) and he lacks knowledge and information sufficient to form a belief about the truth of the third sentence of paragraph 88(i).

9. Answering paragraph 88(j) he lacks knowledge and information sufficient to form a belief about the truth of all of the sentences contained in paragraph 88(j).

10. Answering paragraph 88(m) of the Complaint he lacks knowledge and information sufficient to form a belief about the truth of the first two sentences of paragraph 88(m) and he admits the third and fourth sentences of paragraph 88(m) of the Complaint.

11. Answering paragraph 88(o), in regard to the first sentence, he admits that he thanked Carter for the information but denies that in any way that should be inferred to be participation in any unlawful act. Further answering, he denies all of the remaining allegations contained in paragraph 88(o) of the Complaint.

12. He denies each and every allegation which has not been specifically admitted above and reiterates that he, and to his knowledge, Scottdel and David, committed no unlawful act of any kind.

13. Plaintiffs' Complaint fails to state a claim upon which relief can be granted against Louis.

14. Louis asserts any and all defenses available to him including those under Federal Rule of Civil Procedure 8(c)(1).

Respectfully submitted,



Louis Carson
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419-346-3533

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2011, I sent this Answer by U.s. mail, postage prepaid, to the following:

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